

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:
ALL CASES

Case No. 23-md-03084-CRB

**AFFIDAVIT OF TIFFANY R. ELLIS IN
SUPPORT OF PLAINTIFFS' LIST OF
DISPUTED ENTRIES FOR SPECIAL
MASTER REVIEW**

Judge: Honorable Barbara S. Jones

1 I, Tiffany R. Ellis, hereby declare as follows:

2 1. I am a partner of Peiffer Wolf Care Kane Conway & Wise, an attorney licensed in
3 the States of Michigan and Illinois and duly admitted to practice before this Court, representing
4 Plaintiffs in the above caption action.

5 2. I submit this declaration in support of Plaintiffs' List of Disputed Entries for
6 Special Master Review on March 31, 2025.

7 3. Plaintiffs incorporate the Discovery Letter Brief Regarding Disputed Entries for
8 Special Master Review filed by All Plaintiffs on March 4, 2025. *See* ECF No. 2434. Plaintiffs
9 incorporate the brief to support the specific reasons each entry on the List of Disputed Entries
10 was challenged. The Brief included the general background of the privilege dispute process to
11 date, the legal standard for Plaintiffs raising challenges to Defendants' privilege log entries, and a
12 general argument for the challenges Plaintiffs raised.

13 4. The List of Disputed Entries for Special Master Review Plaintiffs provided on
14 March 31, 2025 contained entries still in dispute for custodian Ryan Graves.

15 5. The List of Disputed Entries for Special Master Review Plaintiffs provided on
16 March 31, 2025 did not contain any entries for the custodians that overlapped with custodians
17 already submitted to the Special Master for review.

18 **Ryan Graves**

19 6. Defendants included approximately 476 entries for Ryan Graves across its
20 Tranche 1, Tranche 2, Tranche 3, and Tranche 4 privilege logs.

21 7. Plaintiffs originally challenged approximately 214 of these 476 entries.

22 8. As of January 31, 2025¹, Defendants withdrew their claim of privilege to 13
23 entries in full and 5 entries in part.

24 9. On March 10, 2025, Defendants provided Plaintiffs with a revised privilege log
25 after Defendants re-reviewed all entries in dispute. Defendants withdrew their claim of privilege
26 to 103 entries in full and 52 entries in part.

27 10. Defendants provided Plaintiffs with its latest revised Privilege Log on March 26,

28 ¹ Defendants provided Plaintiffs a revised privilege log on January 31, 2025. This was the last revised privilege log
Defendants provided before they started providing revised privilege logs in accordance with the Master Order No. 2.
See ECF No. 2357.

2025. In total, to date, Defendants have withdrawn or will withdraw their claim of privilege to approximately 235 entries in full and 122 entries in part. These entries include those on Defendants' post January 10, 2025 privilege logs.

11. On March 18, 2025, Plaintiffs provided the Special Master and Defendants with a list of 31 entries still in dispute for Ryan Graves following a review of Uber's revised privilege log that included updated or additional information provided by Uber, documents produced with redactions, or lessons learned from Judge Cisneros' privilege orders and Defendants' March 14, 2025 privilege log.

12. On March 25, 2025, Defendants provided written response to Plaintiffs' list and the parties met and conferred. On that day, Defendants withdrew their claim to an additional 4 entries and agreed to produce 2 additional entries with redactions or reduced redactions.

13. On March 27, 2025, Defendants updated their March 25, 2025 list, and provided 4 additional entries from which they removed their privilege claim entirely (totaling 8), and agreed to produce 10 additional entries with redactions or reduced redactions.

14. On March 27, 2025 Plaintiffs provided the Special Master and Defendants with a list of 21 entries that remain in dispute for Ryan Graves. The list did include 10 entries that Defendants stated they would produce redacted or with less redactions.

15. On March 27, 2025, Defendants informed Plaintiffs that they intend to produce the remaining production of redacted documents or documents with reduced redactions the following week.

16. On March 31, 2025, Defendants provided the 10 redacted documents mentioned in Plaintiffs' March 27, 2025 letter to the Special Master. Plaintiffs reviewed these 10 redacted documents and removed them from the list of disputed entries.

17. On March 31, 2025 Plaintiffs provided the Special Master and Defendants an updated list of 11 entries still in dispute.

Executed this 31st day of March 2025 in Detroit, Michigan.

/s/ Tiffany R. Ellis

Tiffany R. Ellis